

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

REBECCA BYBEE

Case No. C-1-01-623

Plaintiff

Judge Weber

v.

Magistrate Judge Hogan

THE PROCTER & GAMBLE COMPANY, ET AL.

Defendants

NOTICE OF DEPOSITION

Please take notice that the Plaintiff, by and through counsel, pursuant to Civil Rule 30.02(6), will take the deposition of a Proctor & Gamble representative, at the place and time indicated below. Pursuant to that rule, Proctor & Gamble, is instructed to designate one or more officers, directors, managing agents or other persons to produce and testify regarding all information set forth below. Said deposition shall be filed and read as evidence on behalf of the Plaintiff in this proceeding, or for any other purpose under the Rules of Civil Procedure, and shall continue to be taken day to day until completed. This deposition will be stenographically recorded.

ADDRESS: Droder & Miller
125 West Central Parkway
Cincinnati, OH 45202

DATE: Friday, August 13, 2004

TIME: 10:00 a.m.

/s/ Carl E. Grayson
Carl E. Grayson, Esq. (0067904)
Sutton, Hicks, Lucas, Grayson & Braden, PLC
130 Dudley Road, Suite 250
Edgewood, KY 41017
(859) 331-8883
Trial Attorney for Plaintiff, Rebecca Bybee.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Motion to Compel Discovery has been sent by regular U.S. mail this 27th day of July, 2004 to the following individuals:

John E. Jevicky, Esq.
Jennifer M. Orr, Esq.
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*Trial Attorneys for Defendants The Procter & Gamble Company,
The Procter & Gamble Company Health Care Plan,
The Procter & Gamble Benefit Plan Trust, and W.J. O'Neill.*

/s/ Carl E. Grayson